

**From:** [petersjoan](#)  
**To:** [Andrew Brettler](#)  
**Cc:** [Robert "Bob" L. Raskopf](#); [Patricia M. Patino](#); [Jake Camara](#); [Joel Sichel](#); [Kai Alblinger](#); [Carlos A. Garcia Perez](#); [Gustavo D. Lage](#)  
**Subject:** Re: Request for Meet and Confer/ Doe v. Bonnell  
**Date:** Tuesday, May 20, 2025 2:12:04 PM

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I understand that there might have been postings of the Video in response to other sexually explicit videos of your client, but the links that you sent do not include any such postings of the Video, and have nothing to do with our client. On behalf of our client, we spent a significant amount of time, effort and expense in subpoenaing Kiwi Farms and eliciting its cooperation in the removal of the links to the Video. If your client would like to reimburse the Plaintiff for the legal fees she has incurred to date regarding the removal of the Video from Kiwi Farms, we would consider including the links to the videos of him in the proposed order. Otherwise, he will have to expend his own resources to have his own content removed. We need to take care of our client and so we will proceed with the motion as is which you have already stated that you do not object to.

On Tuesday, May 20, 2025, 04:11:57 PM EDT, Andrew Brettler <[abrettler@berkbrettler.com](mailto:abrettler@berkbrettler.com)> wrote:

I explained to you what these links were. It appears that people have posted the Video in response to other sexually explicit videos featuring our client (having nothing to do with yours). For that reason, we would like to include additional links, among the list of URLs in the Proposed Order.

**Andrew B. Brettler** | BERK BRETTLER LLP  
9119 Sunset Blvd. | West Hollywood, CA 90069  
O: +1.310.278.2111 | M: +1.917.620.2726

On May 20, 2025, at 11:16 AM, petersjoan <[petersjoan@bellsouth.net](mailto:petersjoan@bellsouth.net)> wrote:

We did a quick review of these links. Only one of them includes our client. Kiwi Farms has only agreed to remove links to videos that include our client. I will ask their counsel now if they will agree to removing this URL as

well: <https://uploads.kiwifarms.st/data/video> [REDACTED]

On Tuesday, May 20, 2025, 01:29:54 PM EDT, Andrew Brettler <[abrettler@berkbrettler.com](mailto:abrettler@berkbrettler.com)> wrote:

Thank you for your patience. The links are:

<https://uploads.kiwifarms.st/data/video> [REDACTED]

<https://uploads.kiwifarms.st/data/video> [REDACTED]

<https://uploads.kiwifarms.st/data/video> [REDACTED]

<https://uploads.kiwifarms.st/data/video> [REDACTED]

<https://uploads.kiwifarms.st/data/video> [REDACTED]

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<https://uploads.kiwifarms.st/data/video> [REDACTED]  
[REDACTED]

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On May 20, 2025, at 9:17 AM, Andrew Brettler <abrettler@berkbrettler.com> wrote:

I am working to get those to you asap. Thank you.

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On May 20, 2025, at 9:16 AM, petersjoan  
<petersjoan@bellsouth.net> wrote:



If you provide the links, I will ask Lolcow's counsel if his client is willing to also remove the additional links. If so, we could include them.

On Tuesday, May 20, 2025, 12:11:04 PM EDT, Andrew Brettler <abrettler@berkbrettler.com> wrote:

Thank you, Joan. In general, Mr. Bonnell has no objection to your Motion. Is it sufficient, however, to prevent the republication of the Video? It appears that people have posted the Video in response to other sexually explicit videos featuring our client (having nothing to do with yours). For that reason, we would like to include additional links, among the list of URLs in the Proposed Order.

Sincerely,

**Andrew B. Brettler** | BERK BRETTLER LLP  
9119 Sunset Blvd. | West Hollywood, CA 90069  
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On May 20, 2025, at 7:14 AM, petersjoan <petersjoan@bellsouth.net> wrote:

Here is the draft motion and draft proposed order.

On Monday, May 19, 2025, 10:04:17 PM EDT, petersjoan <petersjoan@bellsouth.net> wrote:

To be clear, I am not proposing filing a joint motion thus I do not think it necessary to provide a draft motion in order to conduct a proper meet and confer. I am merely asking if your client consents to, or does not object to, plaintiff's below described motion submitting the proposed order, and filing the proposed order under seal. Nevertheless, I will provide a confidential draft motion tomorrow morning.

On Monday, May 19, 2025, 09:26:22 PM EDT, Andrew Brettler <abrettler@berkbrettler.com> wrote:

I'll discuss it with my client and get back to you. In all likelihood, it will be after your noon EDT deadline tomorrow. In the meantime, please provide me with a copy of the proposed order so we can conduct a proper meet and confer. Thanks.

**Andrew B. Brettler** | BERK BRETTLER LLP  
9119 Sunset Blvd. | West Hollywood, CA 90069  
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On May 19, 2025, at 6:21 PM, petersjoan  
<petersjoan@bellsouth.net> wrote:

I do not have a draft motion as of yet. The proposed agreed order is simply an order requiring KiwiFarms to remove specific URLs which contain a link to the Video. KiwiFarms has agreed to remove these specific URLs upon an order from the court. The proposed order will be filed under seal so that the URLs are not available to the public. My question is whether defendant consents to: 1) plaintiff asking the court to enter an order requiring KiwiFarms to remove specific URLs that link to the Video; and 2) the proposed order which simply lists the specific URLs being filed under seal.

On Monday, May 19, 2025,  
07:18:26 PM EDT, Andrew Brettler <abrettler@berkbrettler.com> wrote:

I do not understand your contemplated motion. What is the "proposed agreed order" to which you refer in your email below? Please send me a copy so we can properly meet and confer. Thank you.

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9119 Sunset Blvd. | West Hollywood, CA 90069  
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+1.917.620.2726

On May 19, 2025, at  
2:50 PM, Joan peters  
<petersjoan@bellsouth.net>

wrote:

Andrew:

As you are aware, we served a subpoena on KiwiFarms. KiwiFarms has responded and we have received a response and partial production. We should be receiving an additional production in the next few days. KiwiFarms has restricted the production of these documents to attorney's eyes only. If you accept this restriction in writing, we will arrange for the documents to be shared with you.

I am also writing as a meet and confer on the following. KiwiFarms has consented to removing various links to the Video pursuant to a court order. We will be filing a motion requesting the court to enter the proposed agreed order. Do you have any objection to the same? Please advise by noon EST tomorrow.

thanks,  
Joan